

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

---

In re:	:	Bankruptcy No. 24-11678-pmm
RBSF Construction Company	:	Chapter 11
Debtor	:	Application to Extend Time to File Brief

---

**DEBTOR'S APPLICATION FOR EXTENSION OF TIME TO FILE  
BRIEF**

RBSF Construction Company, Chapter 11 Debtor, respectfully requests an extension of time to file his Brief per Order issued March 30, 2025 and avers as follows:

1. Debtor filed a Chapter 11 Petition on May 16, 2024.
2. Current Brief date is June 4, 2025.
3. Debtor's Counsel has personal emergency that precludes full and adequate response by June 4, 2025.
4. Next listing for Motion to Dismiss is July 2, 2025.
5. This is Debtor's first request for additional time.
6. US Trustee and Sub V Trustee do not oppose this request.
7. Counsel has informed lender counsel and has not yet, received a reply.

WHEREFORE, Debtor requests that this court grant an extension to June 18, 2025 to file comprehensive brief

Date: June 4, 2025

/s/ Paul A.R. Stewart  
Paul A.R. Stewart, Esquire  
Legal Helm LLC  
Attorney for Debtor

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

---

In re:	:	Bankruptcy No. 24-11678-pmm
RBSF Construction Company	:	Chapter 11
Debtor	:	Application to Extend Time to File Brief

---

**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2025, upon consideration of the Debtor's Application for Extension of Time to File Brief, the application is HEREBY GRANTED and it is ORDERED the time to file Brief is extended to the \_\_\_\_\_ day of \_\_\_\_\_, 2025.

BY THE COURT:

\_\_\_\_\_  
J.